

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:	:	Chapter 7
	:	
	:	Case No. 24-11442 (MFW)
CHICKEN SOUP FOR THE SOUL	:	(Jointly Administered)
ENTERTAINMENT, INC., <i>et al.</i> , ¹	:	
	:	
Debtors.	:	Re: Docket No. 509

**CERTIFICATION OF COUNSEL REGARDING MOTION OF
BLAKE RIDDER LIMITED FOR ENTRY OF AN ORDER
COMPELLING TRUSTEE TO REJECT MOTION PICTURE
DISTRIBUTION AGREEMENT AND GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On December 9, 2024, Blake Ridder Limited (the “Movant”) filed the *Motion of Blake Ridder Limited for Entry of an Order Compelling Trustee to Reject Motion Picture Distribution Agreement and Granting Related Relief* [D.I. 509] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).
2. Pursuant to the Notice of Motion, objections to the Motion were to be filed and served no later than January 8, 2025 at 4:00 p.m.
3. Prior to the objection deadline, George L. Miller, in his capacity as the chapter 7 trustee (the “Trustee”) of the estates of the above-captioned debtors, filed a limited objection to the Motion [Docket No. 523].

¹ The Debtors in these chapter 7 cases (collectively, the “Debtors”), along with the last four digits of each Debtor’s federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprises, LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508). The Debtors’ corporate headquarters and service address is 132 East Putnam Avenue, Floor 2W, Cos Cob, CT 06807.

4. The undersigned certifies that he has reviewed the Court's docket in this case and no other answer, objection or other responsive pleading to the Motion appears thereon.

5. The Movant and the Trustee have conferred and reached agreement on a form of order regarding the relief requested in the Motion.

6. Movant has prepared a revised form of order (the "Revised Order") that incorporates the resolution reached by the Movant and the Trustee. A copy of the Revised Order is attached hereto as Exhibit A. A blackline, comparing the Revised Order against the Order filed with the Motion, is attached hereto as Exhibit B. A copy of the Revised Order has been shared with the Trustee's counsel who has indicated that he has no further comments to the Revised Order.

7. The Movant therefore respectfully requests that the Bankruptcy Court enter the Revised Order, substantially in the form attached hereto as Exhibit A, at its earliest convenience.

8. Counsel is available if the Court has any questions or concerns.

Dated: March 4, 2025
Wilmington, Delaware

/s/ Kevin S. Mann
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